

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:	o : : : : : : o	Chapter 11
LIGADO NETWORKS LLC, <i>et al.</i> , ¹	:	Case No. 25-10006 (TMH)
Debtors.	:	(Jointly Administered)
	:	Re: D.I. 696 & 700
	:	Hearing Date: August 7, 2025, at 2:00 p.m.
	:	Obj. Deadline: July 24, 2025, at 4:00 p.m.

**OBJECTION OF THE UNITED STATES TRUSTEE TO CONFIRMATION OF THE
JOINT CHAPTER 11 PLAN OF LIGADO NETWORKS LLC AND ITS
AFFILIATED DEBTORS AND DEBTORS IN POSSESSION**

Andrew R. Vara, the United States Trustee for Region 3 (“U.S. Trustee”), by and through his undersigned counsel, objects to confirmation of the *Joint Chapter 11 Plan of Ligado Networks LLC and its Affiliated Debtors and Debtors in Possession* [D.I. 696] (the “Plan”) and in support thereof respectfully states:

JURISDICTION AND STANDING

1. Under (i) 28 U.S.C. § 1334, (ii) applicable order(s) of the United States District Court for the District of Delaware issued pursuant to 28 U.S.C. § 157(a), and (iii) 28 U.S.C. § 157(b)(2), this Court has jurisdiction to hear and determine Plan confirmation and this objection.

¹ The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: Ligado Networks LLC (3801); ATC Technologies, LLC (N/A); Ligado Networks (Canada) Inc. (N/A); Ligado Networks Build LLC (N/A); Ligado Networks Corp. (N/A); Ligado Networks Finance LLC (N/A); Ligado Networks Holdings (Canada) Inc. (N/A); Ligado Networks Inc. of Virginia (9725); Ligado Networks Subsidiary LLC (N/A); One Dot Six LLC (8763); and One Dot Six TVCC LLC (N/A). The Debtors’ headquarters is located at: 10802 Parkridge Boulevard, Reston, Virginia 20191.

2. Pursuant to 28 U.S.C. § 586(a)(3), the U.S. Trustee is charged with administrative oversight of the bankruptcy system in this District. Such oversight is part of the U.S. Trustee's overarching responsibility to enforce the laws as written by Congress and interpreted by the courts. *See Morgenstern v. Revco D.S., Inc. (In re Revco D.S., Inc.)*, 898 F.2d 498, 500 (6th Cir. 1990) (describing the U.S. Trustee as a "watchdog").²

3. Specifically, in accordance with 28 U.S.C. § 586(a)(3) and, more specifically, 28 U.S.C. § 586(a)(3)(B), the U.S. Trustee is charged with the duties and obligations to supervise the administration of cases and trustees in chapter 11 cases, monitoring plans and disclosure statements filed in chapter 11 cases, and filing with the Court comments with respect to such plans and disclosure statements in connection with hearings under sections 1125 and 1128.

4. Under 11 U.S.C. § 307, the U.S. Trustee has standing to be heard on Plan confirmation. *See United States Trustee v. Columbia Gas Sys., Inc. (In re Columbia Gas Sys., Inc.)*, 33 F.3d 294, 295-96 (3d Cir. 1994) (noting that the U.S. Trustee has "public interest standing" under 11 U.S.C. § 307 which goes beyond mere pecuniary interest).

BACKGROUND

5. On March 22, 2025, the Debtors filed the *Joint Chapter 11 Plan of Ligado Networks LLC and its Affiliated Debtors* [D.I. 348] and the *Disclosure Statement for the Joint Chapter 11 Plan of Ligado Networks LLC and its Affiliated Debtors and Debtors in Possession* [D.I. 349].

² See H.R. Rep. No. 595, 95th Cong., 2d Sess. 88 (1977) (United States Trustees "serve as bankruptcy watch-dogs to prevent fraud, dishonesty, and overreaching in the bankruptcy arena.").

6. On March 22, 2025, the Debtors filed their *Motion for Entry of an Order (I) Approving Proposed Disclosure Statement and Form and Manner of Disclosure Statement Hearing, (II) Establishing Voting and Solicitation Procedures, (III) Scheduling Confirmation Hearing, (IV) Establishing Notice and Objection Procedures for Confirmation, and (V) Granting Related Relief* (the “Disclosure Statement/Solicitation Procedures Motion”) [D.I. 350].

7. On April 25, 2025, the U.S. Trustee filed his *Objection to Approval of Disclosure Statement* [D.I. 463] (the “Objection”). A copy of the Objection is attached as **Exhibit A**.

8. On June 23, 2025, this Court held a hearing on the Disclosure Statement/Solicitation Procedures Motion. The Court indicated that the U.S. Trustee’s rights to raise the issues contained in the Objection at the Plan confirmation hearing were reserved.

ARGUMENT

9. The Court should deny Plan confirmation for the reasons stated in the Objection.

RESERVATION OF RIGHTS

10. The U.S. Trustee leaves the Debtors to their burden of proof and reserves any and all rights, remedies and obligations to, among other things, (i) complement, supplement, augment, alter or modify this objection, (ii) file any appropriate motion, or conduct any and all discovery, and (iii) assert such other grounds as may become apparent upon further factual discovery.

WHEREFORE, the U.S. Trustee respectfully requests that this Court deny confirmation of the Plan and grant such other and further relief as the Court deems just and equitable.

Dated: July 24, 2025
Wilmington, Delaware

Respectfully submitted,

ANDREW R. VARA
UNITED STATES TRUSTEE
Regions 3 and 9

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